

UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MASSACHUSETTS

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)
MAURA O'NEILL, as administrator of the Estate)
of Madelyn E. Linsenmeir,)
)
Plaintiff,) C.A. No. 20-30036-MGM
v.)
)
CITY OF SPRINGFIELD, *et al.*)
)
Defendants.)
)
)

DECLARATION

I, Michael E. Nzoiwu, under 28 U.S.C. §1746, declare and verify the following:

1. I am an associate with the law firm of Goulston & Storrs PC in Boston, Massachusetts. I am a member in good standing of the bar of the Commonwealth of Massachusetts and admitted to practice before the U.S. District Court for the District of Massachusetts.
2. I make this declaration based on my personal knowledge.
3. This declaration is made solely for the purpose of authenticating documents that I personally reviewed.
4. On July 11, 2022, I tendered a subpoena, appended schedule, and cover letter to process server Beacon Hill Research for delivery to an address I understood to belong to Maria Sanchez. A true and accurate copy of the subpoena, appended schedule, and cover letter¹ are attached to this declaration as Exhibit A.

¹ To preserve Ms. Sanchez's privacy, the Estate has redacted her address from the cover letter and other exhibits.

5. On July 13, 2022, I received a proof of service confirming that the subpoena, appended schedule, and cover letter had been delivered “in hand to Maria Sanchez” at the address that service had been processed to. A true and accurate copy of the proof of service is attached to this declaration as Exhibit B.

6. On April 15, 2022, I virtually attended the deposition of Sheila Rodriguez, during which court reporter Kathleen L. Good transcribed the deposition. On April 26, 2022, I was provided with the complete transcript of the deposition of Sheila Rodriguez. A true and accurate copy of pages 1, 54, 63, 69, 112, 115, 116, and 130 of the transcript of the deposition of Sheila Rodriguez are attached to this declaration as Exhibit C.

7. A true and accurate copy of the review and decision page of Special Order #18-247 as produced by the City of Springfield in this litigation is attached to this declaration as Exhibit D.

I declare and verify under penalty of perjury that the foregoing is true and correct. Executed on July 25, 2022.



Michael E. Nzoiwu